

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**
2 Stephen A. Swedlow (*pro hac vice*)
3 stephenswedlow@quinnemanuel.com
4 191 N. Wacker Drive, Suite 2700
5 Chicago, IL 60606
6 Telephone: 312-705-7400

7 **HAGENS BERMAN SOBOL SHAPIRO LLP**
8 Shana E. Scarlett (CA 217895)
9 shanas@hbsslaw.com
10 715 Hearst Avenue, Suite 202
11 Berkeley, CA 94710
12 Telephone: 510-725-3000

13 *Interim Co-Lead Consumer Class Counsel*

14 **BATHAEE DUNNE LLP**
15 Yavar Bathaee (CA 282388)
16 yavar@bathaedunne.com
17 445 Park Avenue, 9th Floor
18 New York, NY 10022
19 Telephone: 332-322-8835

20 **SCOTT + SCOTT ATTORNEYS AT LAW LLP**
21 Kristen M. Anderson (CA 246108)
22 kanderson@scott-scott.com
23 230 Park Avenue, 17th Floor
24 New York, NY 10169
25 Telephone: 212-223-6444

26 *Interim Co-Lead Advertiser Class Counsel*

27 **WILMER CUTLER PICKERING HALE
28 AND DORR LLP**

1 Sonal N. Mehta (CA 222086)
2 Sonal.Mehta@wilmerhale.com
3 2600 El Camino Real, Suite 400
4 Palo Alto, CA 94306
5 Telephone: 650-858-6000
6 Facsimile: 650-858-6100

7 David Z. Gringer (*pro hac vice*)
8 David.Gringer@wilmerhale.com
9 Ari Holtzblatt (*pro hac vice*)
10 Ari.Holtzblatt@wilmerhale.com
11 1875 Pennsylvania Ave NW
12 Washington, DC 20006
13 Telephone: 202-663-6000
14 Facsimile: 202-663-6363

15 *Attorneys for Defendant Facebook, Inc.*

16 *UNITED STATES DISTRICT COURT*
17 *NORTHERN DISTRICT OF CALIFORNIA*
18 *SAN JOSE DIVISION*

19 MAXIMILIAN KLEIN, et al., on behalf of
20 themselves and all others similarly situated,

21 Plaintiffs,

22 v.

23 FACEBOOK, INC., a Delaware Corporation
24 headquartered in California,

25 Defendant.

26 Case No. 5:20-cv-08570-LHK

27 **STIPULATION TO ENTER
28 STIPULATED DEPOSITION,
 EXPERT, AND PRIVILEGE
 PROTOCOLS**

1 Judge: Hon. Virginia K. DeMarchi

1 Plaintiffs Maximilian Klein, *et al.* and Defendant Facebook, Inc. (collectively, the “Parties”),
2 by and through their respective counsel, hereby stipulate as follows:

3 WHEREAS, the Parties submitted Proposed Stipulated Deposition, Expert, and Privilege
4 Protocols as exhibits to Letter Briefs presenting disputed provisions of those Protocols to the Court
5 for resolution on September 20, 2021 (Dkt. Nos. 132, 134 and 135);

6 WHEREAS, the Court heard argument on the disputed provisions of the Proposed Stipulated
7 Deposition, Expert, and Privilege Protocols on August 31, 2021 (Dkt. No. 136);

8 WHEREAS, the Parties have, through agreement, resolved some of the disputed provisions
9 of the Proposed Stipulated Deposition, Expert, and Privilege Protocols (Dkt. No. 148);

10 WHEREAS, the Court has issued several Orders resolving all remaining disputed provisions
11 of the Proposed Stipulated Deposition, Expert, and Privilege Protocols (Dkt. Nos. 149-51, 153 and
12 155);

13 WHEREAS, the Parties have modified the previously submitted Proposed Stipulated
14 Deposition, Expert, and Privilege Protocols to reflect the resolutions reached by the Parties and the
15 Court; and

16 WHEREAS, the Parties jointly and respectfully request that the Court enter the Parties’
17 Proposed Stipulated Deposition Protocol, Proposed Stipulated Expert Protocol, and Proposed
18 Stipulated Privilege Protocols, submitted herewith.

19 THEREFORE, IT IS HEREBY SO STIPULATED.

1 DATED: October 28, 2021

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3 By: /s/ Shana E. Scarlett
4 **HAGENS BERMAN SOBOL SHAPIRO LLP**
5 Shana E. Scarlett (CA 217895)
6 shanas@hbsslaw.com
7 715 Hearst Avenue, Suite 202
8 Berkeley, CA 94710
9 (510) 725-3000

10 Steve W. Berman (admitted *pro hac vice*)
11 steve@hbsslaw.com
12 1301 Second Avenue, Suite 2000
13 Seattle, WA 98101

14 **LOCKRIDGE GRINDAL NAUEN P.L.L.P.**
15 W. Joseph Bruckner (*pro hac vice*)
16 wjbruckner@locklaw.com
17 Robert K. Shelquist (*pro hac vice*)
18 rkshelquist@locklaw.com
19 Brian D. Clark (*pro hac vice*)
20 bdclark@locklaw.com
21 Rebecca A. Peterson (CA 241858)
22 rapeterson@locklaw.com
23 Arielle S. Wagner (*pro hac vice*)
24 aswagner@locklaw.com
25 100 Washington Avenue South, Ste 2200
26 Minneapolis, MN 55401
27 (612) 339-6900

28 *Interim Counsel for the Consumer Class*

Respectfully submitted,

By: /s/ Stephen A. Wedlow
1 **QUINN EMANUEL URQUHART & SULLIVAN,
2 LLP**

3 Stephen A. Wedlow (*pro hac vice*)
4 stephenswedlow@quinnmanuel.com
5 Michelle Schmit (*pro hac vice*)
6 michelleschmit@quinnmanuel.com
7 191 N. Wacker Drive, Suite 2700
8 Chicago, IL 60606-1881
9 (312) 705-7400

10 Kevin Y. Teruya (CA 235916)
11 kevinteruya@quinnmanuel.com
12 Adam B. Wolfson (CA 262125)
13 adamwolfson@quinnmanuel.com
14 Brantley I. Pepperman (CA 322057)
15 brantleypepperman@quinnmanuel.com
16 865 South Figueroa Street, 10th Fl.
17 Los Angeles, CA 90017-2543
18 (213) 443-3000

19 Manisha M. Sheth (*pro hac vice*)
20 manishasheth@quinnmanuel.com
21 51 Madison Avenue, 22nd Floor
22 New York, NY 10010
23 (212) 849-7000

1 By: /s/ Kristen M. Anderson
2 **SCOTT+SCOTT**

3 **ATTORNEYS AT LAW LLP**
4 Kristen M. Anderson (CA 246108)
5 kanderson@scott-scott.com
6 230 Park Avenue, 17th Floor
7 New York, NY 10169
8 (212) 223-6444

9 Christopher M. Burke (CA 214799)
10 cburke@scott-scott.com
11 David H. Goldberger (CA 225869)
12 dgoldberger@scott-scott.com
13 Yifan (Kate) Lv (CA 302704)
14 klv@scott-scott.com
15 600 W. Broadway, Suite 3300
16 San Diego, CA 92101
17 (619) 233-4565

18 Patrick J. McGahan (*pro hac vice*)
19 pmcgahan@scott-scott.com
20 Michael P. Srodoski (*pro hac vice*)
21 msradoski@scott-scott.com
22 156 South Main Street, P.O. Box 192
23 Colchester, CT 06415
24 (860) 537-5537

25 **LEVIN SEDRAN & BERMAN LLP**
26 Keith J. Verrier (*pro hac vice*)
27 kverrier@lfsblaw.com
28 Austin B. Cohen (*pro hac vice*)
acohen@lfsblaw.com
510 Walnut Street, Suite 500
Philadelphia, PA 19106-3997
(215) 592-1500

1 By: /s/ Yavar Bathaee
2 **BATHAEE DUNNE LLP**

3 Yavar Bathaee (CA 282388)
4 yavar@bathaeedunne.com
5 Edward M. Grauman (*pro hac vice*)
6 egrauman@bathaeedunne.com
7 Andrew C. Wolinsky (*pro hac vice*)
8 awolinsky@bathaeedunne.com
9 445 Park Avenue, 9th Floor
New York, NY 10022
(332) 322-8835

10 Brian J. Dunne (CA 275689)
11 bdunne@bathaeedunne.com
12 633 West Fifth Street, 26th Floor
13 Los Angeles, CA 90071
14 (213) 462-2772

15 **AHDOOT & WOLFSON, PC**
16 Tina Wolfson (CA 174806)
17 twolfson@ahdootwolfson.com
18 Robert Ahdoott (CA 172098)
19 rahdoot@ahdootwolfson.com
20 Theodore W. Maya (CA 223242)
21 tmaya@ahdootwolfson.com
22 Rachel Johnson (CA 331351)
23 rjohnson@ahdootwolfson.com
24 2600 West Olive Avenue, Ste 500
25 Burbank, CA 91505
26 (310) 474-9111

27 *Interim Counsel for the Advertiser Class*

1 By: /s/ Sonal N. Mehta
2 **WILMER CUTLER PICKERING HALE**
3 **AND DORR LLP**
4 Sonal N. Mehta (CA 222086)
5 Sonal.Mehta@wilmerhale.com
6 2600 El Camino Real, Suite 400
7 Palo Alto, CA 94306
8 (650) 858-6000

9
10 David Z. Gringer (*pro hac vice*)
11 David.Gringer@wilmerhale.com
12 Ari Holtzblatt (*pro hac vice*)
13 Ari.Holtzblatt@wilmerhale.com
14 1875 Pennsylvania Avenue NW
15 Washington, DC 20006
16 (202) 663-6000

17
18 *Attorneys for Defendant Facebook, Inc.*

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20
21
22
23
24
25
26
27
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ATTESTATION OF KRISTEN M. ANDERSON

This document is being filed through the Electronic Case Filing (ECF) system by attorney Kristen M. Anderson. By her signature, Ms. Anderson attests that she has obtained concurrence in the filing of this document from each of the attorneys identified on the caption page and in the above signature block.

Dated: October 28, 2021

By /s/ Kristen M. Anderson
Kristen M. Anderson

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of October 2021, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System, causing the document to be electronically served on all attorneys of record.

By /s/ Kristen M. Anderson
Kristen M. Anderson